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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA.

Plaintiff,

V.

CARLOS COLINDREZ-ERAZO,

Defendant

CASE NO. 2:24-CR-00096-DAD

**STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER**

DATE: September 3, 2024

TIME: 9:30 a.m.

COURT: Hon. Dale A. Drozd

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on September 3, 2024.
 2. By this stipulation, defendant now moves to continue the status conference until October 1, 2024, and to exclude time between September 3, 2024, and October 1, 2024, under Local Code T4.
 3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes audio, photos, and reports related to multiple transactions and drug seizures.
 - b) The defendant was indicted in a separate, related case, on August 22, 2024,

1 *United States v. Cruz, et al*, 2:24-cr-00246-DAD.¹ Discovery in that case is being processed and
2 is expected to be produced the week of September 3, 2024.

3 c) Counsel for defendant desires additional time to meet with his client to discuss the
4 pending charges, review the discovery, and otherwise prepare for trial.

5 d) Counsel for defendant believes that failure to grant the above-requested
6 continuance would deny him/her the reasonable time necessary for effective preparation, taking
7 into account the exercise of due diligence.

8 e) The government does not object to the continuance.

9 f) Based on the above-stated findings, the ends of justice served by continuing the
10 case as requested outweigh the interest of the public and the defendant in a trial within the
11 original date prescribed by the Speedy Trial Act.

12 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
13 et seq., within which trial must commence, the time period of September 3, 2024 to October 1,
14 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
15 T4] because it results from a continuance granted by the Court at defendant's request on the basis
16 of the Court's finding that the ends of justice served by taking such action outweigh the best
17 interest of the public and the defendant in a speedy trial.

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28 ¹ The United States intends to file a notice of related cases.

1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
3 must commence.

4 IT IS SO STIPULATED.

5 Dated: August 29, 2024

PHILLIP A. TALBERT
United States Attorney

7 _____
8 /s/ CAMERON L. DESMOND
CAMERON L. DESMOND
Assistant United States Attorney

10 Dated: August 29, 2024

11 _____
12 /s/ Clemente Jimenez
Clemente Jimenez
Counsel for Defendant
Carlos Colindrez-Erazo

14 **ORDER**

16 Pursuant to the stipulation of the parties and good cause appearing, the status conference
17 scheduled for September 3, 2024 is continued until October 1, 2024, at 9:30 a.m. and time is excluded
18 between September 3, 2024, and October 1, 2024, under Local Code T4.

19 IT IS SO ORDERED.

20 Dated: August 29, 2024

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22 DALE A. DROZD
23 UNITED STATES DISTRICT JUDGE